

National Republican Senatorial Committee

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10-10100-100-00000
JAN 1994

February 2, 1994

Mr. Steven Cohen
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re. February Monthly Report (1/1/93-1/31/93)

Dear Mr. Cohen,

This letter is in response to your request for additional information, dated January 13, 1994. A copy of your letter is enclosed for reference.

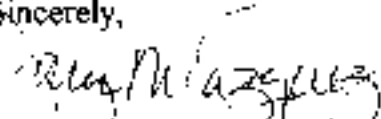
Please be advised that all of our solicitation pieces to prospective donors include a request for donor information; the printed request informs the donor that the information is required by law. Enclosed is a sample solicitation piece; the required language is highlighted in yellow.

Regarding your second paragraph concerning earmarked contributions, we respectfully request clarification. Our records indicate that our schedules A (memo, Line 11(a) and 11(c)) and B (Line 23) include all of the information required by 11CFR 110.6(c)(1)(iv)(A) through (C).

The NRSC historically has paid all fundraising expenses from its Federal account, except for those events that are designed to raise only NonFederal dollars. The event described as 100% NonFederal on Schedule 11(3) was designed to raise both Federal and NonFederal dollars. Thus, all expenses connected with the event were paid from our Federal account and then subject to the allocation process. We were not aware at the time we paid those expenses that the event would raise only NonFederal receipts.

Please call me at (202) 675-4300 if you have further questions, or need additional clarification.

Sincerely,


Sonya M. Vazquez, Treasurer

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

Sonya M. Vazquez, Treasurer
National Republican Senatorial
Committee
425 Second Street NE
Washington, DC 20002

JAN 13 1994

Identification Number: C00027466

Reference: February Monthly Report (1/1/93-1/31/93)

Dear Ms. Vazquez:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's employer/occupation.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." Under 11 CFR 104.7(b), such effort shall consist of a clear request for the information (i.e., name, mailing address, occupation, and name of employer) which request informs the contributor that the reporting of such information is required by law. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer out the amount will be taken into consideration.

-For future reporting, each earmarked contribution forwarded in the form of the contributor's check should disclose all information required by 11 CFR 110.6(c)(1)(iv)(A) through (C) on a memo Schedule A supporting Line 11(a)(i) of the Detailed Summary Page and a separate memo Schedule B supporting Line 23 of the Detailed Summary Page.

-Schedule H3 discloses receipt of \$7,896.33 from your non-federal account for a fundraising event(s) which is listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, a 100% non-federal fundraising event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately take steps to correct any non-compliance with the regulations. Please note, for future reporting purposes, these activities should not be included in your reports.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Stephen Cohen
Reports Analyst
Reports Analysis Division

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate now it was received.

☐ Hand Delivered

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2/2/94

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DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

Eric Smith
PREPARER

2/3/94
DATE PREPARED